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JAMES H. [Signature]
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

SCJ

FREDA D. WILKINS,

Plaintiff,

v.

GENERAL ELECTRIC COMPANY,
LORD AND TAYLOR, LLC,
WORLD FINANCIAL NETWORK
NATIONAL BANK,
EUROMARKET DESIGNS, INC., d/b/a
CRATE AND BARREL,

Defendants.

Civil Action No.

1:11-CV-3882

COMPLAINT

JURISDICTION

1. Jurisdiction of the court arises under 28 U.S.C. §1331 on Plaintiff's federal Claims. This Court has Jurisdiction on Plaintiff's State law Claims pursuant to 28 U.S.C. §1367 (a). This action arises under the FCRA 15 U.S.C. §1681.

PARTIES

2. Plaintiff, Freda Wilkins is a natural person residing in the State of Georgia, County of Gwinnett. Plaintiff's address is 4305 Summit Heights Drive, Snellville GA.30039.
3. Upon Information and belief, Defendant, General Electric Company (GECRB) does business in Georgia and the address of record is 3135 Easton Turnpike, Fairfield CT 06828. The registered agent is CT CORPORATION SYSTEM at 1201 Peachtree St. NE, Atlanta, GA. 30361.

4. Upon Information and belief, Defendant, Lord and Taylor, LLC does business in Georgia and the address of record is 424 5th Avenue, New York, NY 10018.
5. Upon Information and belief, Defendant, World Financial Network National Bank (WFFNB) does business in Georgia and the address of record is 3100 Easton Square Place, Columbus, OH 43219.
6. Upon Information and belief, Defendant, Euromarket Designs, Inc. DBA Crate and Barrel, does business in Georgia and its address is 1250 Techny Road, Northbrook, IL 60062.

VENUE

7. Venue is proper because Plaintiff lives and transacts business here. The Defendants transact business here.

FACTUAL SUMMARY

8. In April 2004, Plaintiff opened an account with WFFNB/Crate and Barrel for personal purchases. Plaintiff made timely payments toward the balance.
9. In August 2005, Plaintiff opened an account with GEGRB/ Lord and Taylor for personal purchases. Plaintiff made timely payments toward the balance.
10. In August 2011, Plaintiff obtained a copy of her credit report which showed derogatory items listed by the defendants. Plaintiff doubted the veracity of the report, filed a dispute with the credit Bureaus and the Defendants personally.
11. Plaintiff Contacted the CRAs (including Experian) lodging a dispute over the recorded information with the Defendants and triggering the CRAs' obligation to reinvestigate pursuant to 15 U.S.C.A. §1681i (a). Experian issued an automated consumer dispute verification form to the Defendants.
12. Thus, Defendants' decision to report the debt but not the dispute resulted in a much lower credit score for Plaintiff than a report of both the debt and the dispute.
13. Plaintiff contacted Experian and was told the information and the dispute was initiated with the defendants and any other contact should be with the Defendants personally.

14. Defendant verified the information as correct, left information unchanged and failed to show the information as disputed. (15 U.S.C. §1681 s-2(b) 1).
15. Plaintiff disputed the information directly with the Defendants and Defendants failed to show the information as disputed.
16. The statute requires the Defendants to perform a reasonable investigation and report the results of the findings. Defendants verified the information and left it unchanged but failed to show the disputed nature.

CAUSES OF ACTION UNDER THE FCRA

17. Plaintiff alleges and incorporates by reference each and every allegation contained in the preceding paragraphs, as though fully set forth herein.
18. Plaintiff disputed information with the Defendants concerning the credit files of the Plaintiff. The Defendants failed to update the credit files and failed to show the information as disputed. 15 U.S.C. §1681s-2(b) 1.
19. As a proximate consequence of the Defendants' negligence, Plaintiff has been caused to suffer emotional and mental distress, and Defendants are liable to Plaintiff for actual, compensatory and punitive damages, costs, and any other and further relief deemed appropriate by this court.

CAUSE OF ACTION FOR DEFAMATION

20. Plaintiff alleges and incorporates by reference each and every allegation contained in the preceding paragraphs, as though fully set forth herein.
21. Defendants published inaccurate information to the files of the Plaintiff.
22. Defendants' negligence allowed the Plaintiff's credit score to be lower which prevented her from obtaining life desires.
23. Defendants knew or should have known their negligence would harm the Plaintiff and the Plaintiff has been harmed.
24. Plaintiff has been denied credit because of the Defendant's negligent reporting of her credit information.

25. Plaintiff has been caused to pay higher rates for insurance and to post higher deposits because of the Defendants' negligence.
26. Defendants caused harm to Plaintiffs credit and reputation.
27. Plaintiff was harmed each and every time the credit files were accessed with the inaccurate information.
28. As a proximate consequence of the Defendants' negligence, Plaintiff has been caused to suffer emotional and mental distress, and Defendant is liable to Plaintiff for actual, compensatory and punitive damages, costs, and any other and further relief deemed appropriate by this court.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that a Judgment be entered against the Defendants for the following:

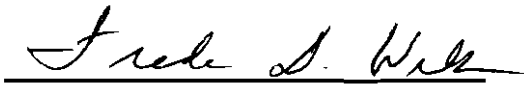
- [a) Actual Damages
- [b) Statutory Damages
- [c) Compensatory Damages
- [d) Punitive Damages
- (e) Injustice Relief and Training where this will not happen again.

Freda D. Wilkins
4305 Summit Heights Drive
Snellville, GA 30039
f.wilkins2@gmail.com
678-791-6821

DEMAND FOR JURY TRIAL

Please take note that Plaintiff demands trial by jury in this action.

Date: November 9, 2011

A handwritten signature in cursive script, appearing to read "Freda D. Wilkins", is written over a horizontal line.

Signature

VERIFICATION

I, Freda Wilkins, do declare under penalty of perjury as delineated in 28 U.S.C. §1746 that the information contained herein is true and correct to the best of my knowledge. Executed this 9th day of November in the State of Georgia, County of Gwinnett, and City of Snellville.

A handwritten signature in cursive script, appearing to read "Freda D. Wilkins", is written over a horizontal line.

Freda D. Wilkins